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* MEMBER OF NY BAR
\$ MEMBER OF NJ BAR

August 30, 2022

Via ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Network Data Rooms, LLC v. Saulrealism LLC and Ryan Saul*
Docket No. 22-cv-02299-LGS
Additional NDR Azure DevOps Source Code Repositories
and Discovery Request

Your Honor:

Please be reminded that Goldberger & Dubin, P.C., represents the Defendants in this action, Saulrealism LLC, and Ryan Saul. The Court Ordered that counsel meet and confer and file a joint letter regarding outstanding discovery issues that should be raised prior to the evidentiary hearing scheduled on September 20, 2022. Plaintiff has already filed a letter without conferring [DKT No 88]. Defendants file this letter requesting additional discovery that is reasonably required prior to the evidentiary hearing.

On Friday, August 26, 2022, Plaintiff produced emails from David Delorge from January 14, 2022 through present as ordered. These emails revealed that there are multiple NDR DealTable Azure DevOps projects and/or repositories. Expert Terry Patterson reviewed the NDR-2021 source repository to produce his reports. *Terry Patterson Expert Report* pg. 8 [DKT 49] (“There is a master repository and 13 branches in the NDR-2021 source repository.”).

The appended emails show that there are additional repositories named “DealTable 2022

GITHUB SourceCode” and “Dealtable Old Development.” This demonstrates that the Plaintiff has multiple repositories, and repositories can easily be renamed.

Additionally, undersigned counsel has carefully reviewed the first batch of email productions from David Delorge. There were no emails produced that are similar to the appended emails regarding the creation or renaming of any projects. This would suggest that the quantity of repositories was intentionally withheld.

It is my understanding that the independent expert’s reports are based upon a single repository and thus the contents of these reports are unreliable. Plaintiff has denied the Defendants access to its Azure DevOps system. Counsel is requesting that the Court Order Plaintiff to confirm the names of all Azure DevOps repositories and/or projects it has used from December 2020 through present and (2) confirm which repositories expert Terry Patterson had access to when preparing his reports.

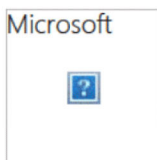
Respectfully submitted,

S/

Renee Wong, Esq.
On behalf of Defendants
Goldberger & Dubin, P.C.
Of Counsel

CONFIDENTIAL

From: [Azure DevOps](#)
To: ddelorge@dealtable.onmicrosoft.com; BPuckhaber@dealtable.com; jackc@networkdatarooms.com; thomasc@networkdatarooms.com; tconcannon@dealtable.com
Subject: A project you are a member of has been renamed
Date: Thursday, February 24, 2022 10:39:45 AM

Azure **DevOps**

Your team project was renamed!

The team project **DealTable 2022 GITHUB SourceCode** has been renamed to **DealTable 2022 GITHUB SourceCode** in the organization [Dealtable](#).

[Go to DealTable 2022 GITHUB SourceCode](#)

What to expect

The team project's version control paths, work items, build pipelines, and other artifacts have been updated to reflect the new name. Depending on how you work with the team project, you may need to take additional actions:

- If you use Visual Studio, Eclipse, Microsoft Excel, PowerPoint, or Project with the Azure DevOps team project, save your work and restart each application.
- If the team project uses Git, then update your remote to use the new project name.
- If the team project uses TFVC, update your Visual Studio client to the latest release or update, and perform a get to update your workspaces with the new project name.

[More details](#)

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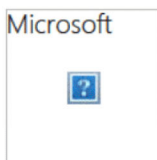
One Microsoft Way, Redmond, WA, USA 98052.

Sent from Azure **DevOps**

CONFIDENTIAL

Plaintiff's Prod 001965

From: [Azure DevOps](#)
To: ddelorge@dealtable.onmicrosoft.com; BPuckhaber@dealtable.com; jackc@networkdatarooms.com; thomasc@networkdatarooms.com; tconcannon@dealtable.com
Subject: A project you are a member of has been renamed
Date: Sunday, February 20, 2022 5:16:20 PM



Azure **DevOps**

Your team project was renamed!

The team project **DealTable Development 2022** has been renamed to **Dealtable Old Development** in the organization [Dealtable](#).

[Go to Dealtable Old Development](#)

What to expect

The team project's version control paths, work items, build pipelines, and other artifacts have been updated to reflect the new name. Depending on how you work with the team project, you may need to take additional actions:

- If you use Visual Studio, Eclipse, Microsoft Excel, PowerPoint, or Project with the Azure DevOps team project, save your work and restart each application.
- If the team project uses Git, then update your remote to use the new project name.
- If the team project uses TFVC, update your Visual Studio client to the latest release or update, and perform a get to update your workspaces with the new project name.

[More details](#)

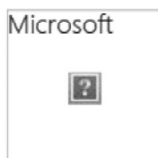
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Microsoft respects your privacy. Review our Online Services [Privacy Statement](#).

One Microsoft Way, Redmond, WA, USA 98052.

Sent from Azure **DevOps**

From: Azure DevOps
To: ddelorge@dealtable.onmicrosoft.com; BPuckhaber@dealtable.com; jackc@networkdatarooms.com; thomasc@networkdatarooms.com; tconcannon@dealtable.com
Subject: A project you are a member of has been renamed
Date: Thursday, February 24, 2022 10:39:00 AM



Azure DevOps

Your team project was renamed!

The team project **DealTable 2022 Source Code Repo** has been renamed to **DealTable 2022 GITHUB SourceCode** in the organization Dealtable.

[Go to DealTable 2022 GITHUB SourceCode](#)

What to expect

The team project's version control paths, work items, build pipelines, and other artifacts have been updated to reflect the new name. Depending on how you work with the team project, you may need to take additional actions:

- If you use Visual Studio, Eclipse, Microsoft Excel, PowerPoint, or Project with the Azure DevOps team project, save your work and restart each application.
- If the team project uses Git, then update your remote to use the new project name.
- If the team project uses TFVC, update your Visual Studio client to the latest release or update, and perform a get to update your workspaces with the new project name.

[More details](#)

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Sent from Azure DevOps